

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Lorente Lamar Washington

Case No. Case: 2:22-mj-30232
Assigned To : Unassigned
Assign. Date : 5/17/2022
USA V. WASHINGTON (CMP)(CMC)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 11, 2022 and May 16, 2022 in the county of Oakland in the
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 922(g)(1)	Felon in possession of ammunition.
18 U.S.C. § 922(g)(1)	Felon in possession of a firearm.

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: May 17, 2022

City and state: Detroit, MI



Complainant's signature

Brett J. Brandon, Special Agent, ATF

Printed name and title



Judge's signature

Hon. Kimberly G. Altman, United States Magistrate Judge

Printed name and title

IN THE UNITED STATES DISTRICT COURT
FOR EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

AFFIDAVIT IN SUPPORT OF
AN CRIMINAL COMPLAINT

I, Brett J. Brandon, being first duly sworn, hereby state:

1. I have been a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives, United States Department of Justice, assigned to the Detroit Field Division since July 2013. I graduated from the Criminal Investigator Training Program and the ATF Special Agent Basic Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia. During my employment with ATF, I have conducted and/or participated in numerous criminal investigations focused on firearms, drug trafficking violations, and criminal street gangs.

2. I make this affidavit from personal knowledge based on my participation in this investigation, including interviews conducted by myself and/or other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience.

3. ATF is currently conducting a criminal investigation concerning LORENTE LAMAR WASHINGTON. (B/M; DOB: XX/XX/1992) for violations of 18 U.S.C. § 922(g)(1) (Felon in Possession of a Firearm), among other state and federal criminal violations.

PROBABLE CAUSE
CRIMINAL HISTORY

4. On March 4, 2021, WASHINGTON pled guilty in Michigan Sixth Circuit Court to felony Domestic Violence – Third Offense Notice. On April 8, 2021, WASHINGTON was sentenced to a twenty-four-month term of probation under the supervision of the Michigan Department of Corrections. WASHINGTONS' terms of probation include the term, "NOT USE OR POSSESS ANY FIREARM OR OTHER DEADLY WEAPON." WASHINGTON identified his address as an apartment in Pontiac, Michigan, where he lives with his grandmother. However historical, pen register, and "ping" data obtained pursuant to federal search warrants for two cellular devices utilized by WASHINGTON, revealed he spends a majority of the overnight hours in areas not including his grandmother's apartment. According to terms of probation, WASHINGTON is also prohibited from

leaving the state of Michigan without permission. According to WASHINGTON's probation agent, WASHINGTON has not asked or been granted permission to leave the state.

APRIL 11, 2022 SHOOTING

5. On April 11, 2022 at approximately 7:37 pm, OCSO deputies responded to a reported shooting in the area of Colorado Avenue and Motor Street in Pontiac, Michigan. Deputies spoke to a witness who stated a rear passenger in a blue Dodge Durango exited the vehicle and fired multiple shots northbound on Motor Street. The witness described the suspect that fired the shots as a black male, early twenties, wearing a black hooded sweatshirt, black sweatpants, and a black mask covering half of his face. Deputies did not locate any victims or a shooting scene at that time.

6. On April 12, 2022, the OCSO ATF re-canvassed the area for information related to the shooting.

7. The OCSO and ATF recovered security camera footage which captured a blue Durango travel south on Motor Street. While at the intersection of Colorado Avenue and Motor Street an exchange of gunfire can be heard. Shortly thereafter, a dark gray newer model Jeep

Grand Cherokee traveled northbound at high rate of speed. The Jeep stopped just south of the driveway of a residence on Nebraska Avenue (located on Motor Street) and the front passenger, a black male with shorter hair and facial hair, wearing a white t-shirt, a gray hooded sweatshirt, and what appear to be pink boxer shorts, hung out the window firing a pistol in the direction of the Durango. The black male then yelled, "Come on! Come on!" while waving the pistol in a motion as if to direct the Durango to follow the Jeep. See below screen capture taken from the surveillance video.



8. While in the area of Motor Street and Colorado Avenue, the OCSO and ATF located and recovered eighteen 9mm fired cartridge cases from Motor Street just south of Colorado Avenue.

9. While in the area of Motor Street and Nebraska Avenue, the OCSO and ATF located and recovered six fired cartridge cases from Motor Street just south of Nebraska Avenue. The recovery location was consistent with the shots being fired from the Jeep in the surveillance video. I noted at least one of the fired cartridge cases had the headstamp "SAR 9MM LUGGER".

10. On April 19, 2022, the OCSO, aware of the description of the Jeep used in the shooting based on a "Be on Lookout" containing an image of the Jeep sent out on April 12, 2022, located a dark gray 2018 Jeep Grand Cherokee with apparent gunshot damage bearing a Michigan license plate registered to WASHINGTON partially concealed underneath a tarp at vacant residence on S. Marshall Street in Pontiac, Michigan. The OCSO noted the residence front door was open and there were no working utilities when they tried to make contact with any occupants. The OCSO towed the vehicle to the Pontiac substation

and subsequently obtained a search warrant for the vehicle from Michigan 50th District Court for evidence related to the shooting.

11. On April 20, 2022, the OCSO and ATF searched the vehicle pursuant to the search warrant and located and recovered one 9mm fired cartridge case bearing the headstamp “*USA* 9MM LUGGER” from the driver’s side windshield well. The OC Lab conducted a physical direct comparison of the fired cartridge case to six fired cartridge cases recovered from the Jeep’s route of travel in the shooting and identified them as having been fired from the same firearm. The OCSO and ATF also located multiple documents inside the vehicle in WASHINGTON’s name to include court documents, a traffic ticket, and Michigan and Ohio unemployment insurance documents. The Oakland County Forensic Laboratory conducted a direct comparison and identified the 9mm fired cartridge case recovered from the Jeep as being fired from the same firearm as the six fired cartridge cases from Motor Street just south of Nebraska Avenue (the recovery location consistent with the shots being fired from the Jeep in the surveillance video).

12. On April 21, 2022, ATF Interstate Nexus Expert, Special Agent Michael Jacobs advised the above 9mm fired cartridge cases

bearing the headstamps “*USA* 9MM LUGGER” AND “SAR 9MM LUGGER” are ammunition as defined under 18 U.S.C. § 921 and manufactured outside of the state of Michigan after 1898, and therefore travel in and affect interstate commerce.

FEDERAL SEARCH WARRANT

13. On May 13, 2022, I swore to and obtained a sealed federal search warrant for 346 N. Cass Avenue in Pontiac, Michigan.

14. On May 16, 2022, the ATF and OCSO served a sealed federal search warrant for 346 N. Cass Avenue in Pontiac, Michigan.

15. During the entry, WASHINGTON tried to flee out of the side door, but encountered an ATF Task Force Officer covering the side door and retreated into the residence shortly after opening the door. The entry team eventually encountered WASHINGTON, wearing a white t-shirt, gray sweatpants, and blue socks, laying on the couch in the living room.

16. The ATF recovered the following firearms from the living room:

- a. One black Beretta APX 9mm pistol bearing serial number “A119883X” loaded with one round in the chamber and

fifteen rounds in the extended magazine inserted in the firearm. Located and recovered from the end table along the east wall in the living room, directly next to the couch the entry team encountered WASHINGTON laying on.

- b. One brown wood and metal Zastava model N-PAPDF 7.62 caliber rifle bearing serial number “NPDF012965” loaded with one round in the chamber and thirty rounds in the magazine inserted in the firearm. Located and recovered from the living room closet along the north wall.
- c. One black American Tactical OMNI -Hybrid multi-caliber AR pistol bearing serial number “NS269305” loaded with one round of .223 caliber ammunition in the chamber and thirty rounds of .223 caliber ammunition in the magazine inserted in the firearm. Located and recovered from the living room closet along the north wall.

17. The ATF recovered the following items from the Dodge Durango parked in the backyard of the residence.

- a. One black and tan ROMARM SA-CUGIR SAR-1 7.62 caliber rifle bearing serial number “S1-86906-03” loaded

with one round in the chamber and numerous rounds in two thirty round magazines duct tapped together and inserted in the firearm. Located and recovered from the front passenger floorboard of the Dodge Durango parked in the backyard.

- b. One gray Black Rain Ordinance SPEC15 multi-caliber rifle bearing serial number “SM031551” loaded with one round of 7.62 caliber ammunition in the chamber and thirty-one rounds of 7.62 caliber ammunition in the magazine inserted in the firearm. Located and from the front passenger floorboard of the Dodge Durango parked in the backyard.
- c. One black Master Piece Arms 9mm pistol bearing serial number “FJ01077” with an empty extended magazine inserted. Located and recovered by Special Agent Weston from the front passenger floorboard of the Dodge Durango parked in the backyard.

18. The ATF also recovered hundreds of rounds of ammunition from the residence.

19. On May 16, 2022, I contacted ATF Interstate Nexus Expert, Special Agent Jimmie Pharr and provided a verbal description of the above-referenced firearms. Based upon the verbal descriptions, Special Agent Pharr advised the firearms are firearms as defined under 18 U.S.C. § 921 and manufactured outside of the state of Michigan after 1898, and therefore had traveled in and affected interstate commerce.

20. During the search warrant service, another occupant, JAMAL DANIEL CHAMPELE, also a convicted felon, was utilizing a cell phone while in handcuffs on the front porch. For officer safety, ATF seized the phone from CHAMPELE and I planned to secure the phone for the remainder of the search while I processed evidence. Upon receiving the phone, which was unlocked and open to the Facebook application. I observed several thumbnail images, to include a thumbnail of a five second video of what appeared to be the black and tan ROMAR SA-CUGIR SAR-1 7.62 caliber rifle and the black American Tactical OMNI -Hybrid multi-caliber AR pistol on the kitchen table inside 346 N. Cass Avenue as well as several thumbnail images of CHAMPELE. As I attempted to place the device in airplane mode, I accidentally clicked the video open which revealed the black Beretta

APX 9mm pistol and one gray Black Rain Ordinance SPEC15 multi-caliber rifle on the kitchen table with the other firearms. The camera then pans to the right and shows a black male (below the neck) wearing a white t-shirt, gray sweatpants, blue socks holding the brown wood and metal Zastava N-PAPDF 7.62 caliber rifle. Based upon my interactions with WASHINGTON during the search warrant and subsequent interview, WASHINGTON's clothing appeared to be consistent with the black male's holding the Zastava N-PAPDF 7.62 caliber rifle.

21. During the search warrant service, the homeowner, stated she observed the Beretta APX 9mm pistol on the end table next to WASHINGTON while the ATF entered the home. The homeowner stated she looked at WASHINGTON and yelled "WHAT THE FUCK!" The homeowner also stated she never saw any of the firearms in the house prior the search warrant service, other than one firearm lawfully registered to the homeowner (not listed above).

POST-MIRANDA INTERVIEW

22. On May 16, 2022 at approximately 12:00 pm, OCSO Detective (Det.) Bader, Special Agent Weston, and I conducted an video

and audio recorded post-Miranda interview of WASHINGTON at the OCSO Pontiac Substation. I read aloud the “Rights” portion of the ATF Advice of Rights and Waiver (ATF Form 3200.4) and WASHINGTON read aloud the “Waiver” portion. WASHINGTON did not want to sign the form, but verbally acknowledged he understood his rights, voluntarily agreed to waive his rights, and in response to questioning, stated in summary and not verbatim, as follows:

23. WASHINGTON admitted to being a convicted felon currently on probation for a felony domestic violence offense.

24. WASHINGTON stated he possessed a firearm on April 11, 2022 during the above-referenced shooting, but did not know the make or model;

25. WASHINGTON admitted to receiving the firearm from the driver prior to being initially shot at by the other vehicle;

26. WASHINGTON admitted to shooting the firearm approximately sixteen times after being shot at;

27. WASHINGTON reviewed the above-referenced surveillance video and confirmed he was the one firing the firearm;

28. WASHINGTON denied ownership of the Baretta 9mm pistol recovered during the federal search warrant on the end table next to the couch where WASHINGTON was encountered by the entry team;

29. WASHINGTON admitted to sleeping on the couch the previous night with his significant other.

30. WASHINGTON denied knowledge and ownership of any other firearms recovered at residence.

CONCLUSION

31. Based upon the aforementioned facts stated herein, there is probable cause to believe LORENTE LAMAR WASHINGTON (B/M; DOB: XX/XX/1992), a convicted felon aware of his felony conviction, did knowingly and intentionally possess 9mm fired cartridge cases bearing the headstamps “*USA* 9MM LUGGER” AND “SAR 9MM LUGGER”, ammunition having affected interstate commerce, in violation of 18 U.S.C. § 922(g)(1) – Felon in Possession of Ammunition. Said violation occurring on or about April 11, 2022, in the city of Pontiac, in the County of Oakland, in the Eastern Judicial District of Michigan. Additionally, WASHINGTON also possessed a Beretta APX 9mm pistol and Zastava N-PAPDF 7.62 caliber rifle, firearms having affected

interstate commerce, in violation of 18 U.S.C. § 922(g)(1) – Felon in Possession of a Firearm. Said violation occurring on or about May 16, 2022, in the city of Pontiac, in the County of Oakland, in the Eastern Judicial District of Michigan.

Respectfully submitted,



Brett J. Brandon
ATF Special Agent

Sworn to before me and signed in my presence and/or by reliable electronic means.



Hon. Kimberly G. Altman
United States Magistrate Judge

Dated: May 17, 2022